

Holcomb-Naselle Transmission Line Rebuild Project

Finding of No Significant Impact and Floodplain and Wetlands Statement of Findings

Bonneville Power Administration

DOE/EA-2091

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INTRODUCTION

Bonneville Power Administration (BPA) announces its environmental findings for the Holcomb-Naselle Transmission Line Rebuild Project. The project would rebuild the 21-mile-long Holcomb-Naselle No.1 115-kilovolt (kV) transmission line located in Pacific and Wahkiakum counties, Washington.

BPA has prepared an environmental assessment (EA) evaluating the Proposed Action and the No Action Alternative.

Based on the analysis in the EA, BPA has determined that the Proposed Action is not a major federal action significantly affecting the quality of the human environment, within the meaning of the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*). Therefore, the preparation of an environmental impact statement (EIS) is not required and BPA is issuing this Finding of No Significant Impact (FONSI) for the Proposed Action. The Proposed Action is not the type of action that normally requires preparation of an EIS and is not without precedent.

The comments received on the Draft EA and responses to those comments are included in the Final EA. The Final EA also identifies changes made to the Draft EA.

Attached is a Mitigation Action Plan that lists all the mitigation measures that BPA and its contractors are committed to implementing. The FONSI also includes a statement of findings on how the Proposed Action impacts wetlands and floodplains. Impacts to wetlands and floodplains would be avoided where possible and minimized by the mitigation measures included in the EA and Mitigation Action Plan where there is no practicable alternative.

PUBLIC AVAILABILITY

The Final EA, FONSI and MAP will be posted on BPA's project website:
www.bpa.gov/goto/HolcombNaselleRebuild

PROPOSED ACTION

Under the Proposed Action, BPA would replace approximately 111 of the existing wood-pole transmission line structures; replace existing conductors and hardware; replace overhead ground wire

and counterpoise in the first 0.5 miles out from Naselle Substation and install overhead ground wire and counterpoise in the first 0.5 miles out from Holcomb Substation; install fiber optic cable on the transmission line; establish a temporary material storage yard, helicopter landing zones, and conductor pulling/tensioning sites; upgrade the access road system; remove danger trees along the transmission line right-of-way edge; and replace equipment within Naselle and Holcomb substations.

BPA is working to determine the best way to sequence the work in 2020 and 2021. BPA will issue a public notification of the construction schedule once it is determined.

NO ACTION ALTERNATIVE

Under the No Action Alternative, BPA would not rebuild the transmission line or upgrade access roads as a single coordinated project. However, the reliability and safety concerns that prompted the need for the Proposed Action would remain. BPA would continue to operate and maintain the existing transmission line in its current condition, replacing failed conductor fittings, replacing aged and rotting structures as they deteriorate, maintaining access roads to allow access to structures on an as-needed basis, and managing vegetation for safe operation. Given the current poor condition of the transmission line, the No Action Alternative would likely cause more frequent and more disruptive maintenance activities than has been required in the past. It might be possible to plan some repairs, but many would likely occur on an emergency basis as the transmission line continues to deteriorate.

The overall scale and scope of the repairs that would be done under the No Action Alternative would be smaller than what is planned under the Proposed Action. The maintenance program addresses immediate needs to keep the transmission line functioning, and would likely not include more comprehensive improvements such as access road work to improve water runoff, fish-passable culvert replacements, conductor replacement, or installation of fiber optic cable. Access road work under the No Action Alternative would be limited to enhancements necessary to allow access to specific structures for as-needed repairs and maintenance.

SIGNIFICANCE OF POTENTIAL IMPACTS OF THE PROPOSED ACTION

To determine whether the Proposed Action has the potential to cause significant environmental effects, BPA analyzed the potential impacts of the proposal on human and natural resources and presented them in Section 3 of the EA. Not all of the resources present in the project corridor would be affected by the alternatives because there would be either no or only an extremely small, insignificant impact on the resource from the project. Because these resources are not affected by the proposed project, they were not evaluated further in the EA.

To evaluate potential impacts from the Proposed Action, four impact levels were used – high, moderate, low and no impact. These impact levels are based on the considerations of context and intensity defined in the Council of Environmental Quality regulations (40 Code of Federal Regulations 1508.27). High impacts could be considered significant impacts, if not mitigated, while moderate and low impacts are not. The potential impacts associated with the Proposed Action are summarized below. The Proposed Action, with implementation of selected mitigation measures, would have no significant impacts. The following discussion provides a summary of the Proposed Action's potential impacts and the reasons these impacts would not be significant.

Soils and Geologic Hazards

Impacts on soils would be low-to-moderate.

- Construction activities for structure replacement would temporarily disturb about 57 acres of soil, which would be revegetated. Work on structure landings would permanently compact a total of about 1 acre of soil. Measures such as using existing holes, limiting construction to the dry season, use of erosion control devices, and revegetation would limit erosion in disturbance areas.
- Pole wraps and culvert bases would be used on 16 structures located within 50 feet of a wetland or a stream to contain pentachlorophenol and help prevent it from leaching into surrounding soils.
- Soil erosion along roads would be lessened through the addition of water control structures, such as waterbars, drain drips, and new gravel surfacing.
- Reconstruction of the access road turn in line mile 9 would permanently impact about 1 acre from construction of the cut and fill slopes and would impact about 1 acre temporarily. The 1 acre temporarily disturbed around the perimeter of the widening work would be stabilized with best management practices (BMPs) and revegetated.

Vegetation

Impacts on vegetation would be low-to-moderate in the short term and low in the long term.

- At structure sites, about 80 acres of vegetation would be temporarily disturbed.
- At pulling and tensioning sites, about 9 acres of vegetation would be temporarily disturbed.
- Reconstruction of about 90 feet of existing access road would remove about 0.04 acres of vegetation.
- About 1 acre of vegetation would be permanently removed within the access road turn in line mile 9. In the outer 1 acre temporary disturbance area, vegetation would be allowed to regrow.
- About 415 danger trees would be removed along the 21-mile long right-of-way during construction. Tree removal also would occur at the pulling and tensioning site at structure 1/2 and along an access road in line mile 5. Almost all tree removal would require single tree removal rather than removal of groups of trees (except for the pulling site at structure 1/2 and the reconstructed u-shaped turn in line mile 9).
- Three patches of pink fawn-lily found in the transmission line right-of-way near structures 13/2 and 13/5 would be avoided.
- Noxious weed infestations already exist throughout the transmission line and BPA would implement mitigation measures, such as wash or blow stations and revegetation with native seeds, to prevent further spread of weeds.

Water Resources, Floodplains, and Fish

Impacts on water resources, floodplains, and fish would be low.

- Except structure 10/1, structures located within 100 feet of streams (5/1, 8/7, 10/1, 12/7, 14/6 and 16/1) would be replaced in the same location in already cleared and disturbed areas. Structure 10/1 would be moved farther away from Alder Creek. Use of erosion control measures and vegetative buffers would help absorb sediments dispersed from work areas. Most construction work would occur during the dry season, which would reduce the potential for runoff.

- About 10 individual trees would be removed within 50 feet of streams, distributed among 6 different streams throughout the length of the project corridor. Some of the trees proposed for removal at the pulling and tensioning site at structure 1/2 would be within 100 feet of Green Creek. Because they are small, these trees likely do not provide shade to the creek.
- Road widening in the line mile 9 turn would occur within about 100 feet of a tributary to Alder Creek. Work would occur during the dry season and temporarily disturbed soils would be mulched and reseeded to minimize erosion.
- Two culvert replacements would occur in fish-bearing streams (in unnamed tributaries to Trap Creek) in line mile 4. Work would occur within the in-stream work window if water is present with BMPs used to prevent sediment movement downstream.
- No trees would be removed and no new structures or roads would be constructed in floodplains.
- Replacement of the two fish-bearing stream culverts would improve fish passage to upstream aquatic habitats. Work conducted during in-water work windows would limit impacts on fish habitat. Vegetation removal or structure replacement would not occur within 300 feet of the Willapa River where bull trout habitat may be present.

Wetlands

Impacts on wetlands would be low.

- Three structures would be replaced in wetlands. Wetland mats would be used to lessen impacts on wetland soils and vegetation during structure work. About 5 acres total of wetland vegetation would be temporarily disturbed during construction at structures in or near wetlands.
- Road improvement in wetlands would occur along six sections of access road. Although improvement would not include road widening, temporary impacts would occur from removal of vegetation along roads distributed across 10 wetlands.
- One pulling and tensioning site would be partially located in a wetland at structure 21/10. Wooden mats would be used and all temporary disturbance areas in wetlands would be reseeded with an appropriate native seed mix.
- No trees would be removed in wetlands.

Wildlife

Impacts on wildlife would be low. Impacts on marbled murrelet would be low-to-moderate but temporary.

- Wildlife, especially nesting birds, could be temporarily displaced by the removal of danger trees. Danger tree removal in suitable marbled murrelet habitat and within 110 yards of known occupied marbled murrelet habitat would be avoided between April 1 and September 23 to minimize displacement of nesting birds.
- Vegetation removal/disturbance would temporarily impact wildlife habitat. Use of appropriate weed control measures would reduce the long-term impact to wildlife habitat.
- Construction noise and activity levels would be temporary and wildlife would be expected to return after construction is complete.
- Bird flight diverters would be placed on the conductors in eight locations along the transmission line to lessen the risk of potential collisions.

- Occurrences of Dunn’s salamander and Van Dyke’s salamander have been identified within the riparian areas of Trap Creek about 0.2 mile southwest of line mile 5. However, riparian areas crossed by the right-of-way and roads are cleared of all tall-growing vegetation so impacts on heavily forested stream borders, rocky seeps, and wet talus slopes where the salamanders may be present are unlikely.
- Western toad utilizes various habitats around ponds and slow-moving rivers and streams. Because the culvert work in streams would occur in the dry season, western toad would likely not be present or would be temporarily displaced.
- Marbled murrelet, assumed present in occupied habitat (line mile 13), could be disturbed by construction during the nesting season, April 1 through September 23. In occupied habitat, work would begin two hours after sunrise and end two hours before sunset during the nesting season to reduce disturbance. Approximately 66 danger trees that would be removed in marbled murrelet suitable and known occupied habitat, 3 danger trees in known occupied habitat, either have no nesting platforms or do not have potential structure for nesting platforms.
- Suitable habitat for streaked horned lark and yellow-billed cuckoo would not be impacted because trees would not be removed in riparian areas. Inhabitants of two northern spotted owl nest trees, located more than 2 miles east of the project corridor, could be temporarily disturbed if the birds pass through the corridor during construction.

Cultural Resources

Impacts on cultural resources would be none-to-low.

- Rebuilding the transmission line would not adversely affect the characteristics that make it eligible for listing in the National Register of Historic Places.
- Cultural site 45PC247 is located in and around an existing structure and has been disturbed by the previous construction and maintenance of the line. The existing structure is not proposed for replacement and access road work would not occur in the site boundaries. To prevent temporary disturbance to the site, all vehicles and equipment would be parked within the existing access road prism. Additionally, the number of vehicles would be limited within the site. Site boundaries would be marked for avoidance prior to construction and the right-of-way would be blocked by flagging to prevent disturbance to the site.

FLOODPLAIN AND WETLAND STATEMENT OF FINDINGS

In accordance with the Department of Energy’s NEPA implementing regulations and compliance with Floodplain and Wetland Environmental Review Requirements (10 CFR Part 1021 and 1022), BPA assessed the project’s potential impacts to floodplains and wetlands (see Sections 3.2.3 and 3.2.4 of the EA), considered alternatives to avoid impacts, and identified measures to mitigate adverse effects.

Structure replacement and access road work would not occur in floodplains. Five danger trees would be removed along the edge of Green Creek’s floodplain in line mile 1 and three danger trees would be removed along the edge of an unnamed stream’s floodplain in line mile 21.

About 1800 square feet of wetlands that could not be avoided would be permanently impacted from replacement of three transmission structures and culvert replacement. Relocation of these structures out of the wetlands was not considered because the line would need to be rerouted requiring additional right-of-way. Additionally, the line crosses the wetlands in a perpendicular manner making avoidance difficult. About 0.5 acres of wetlands that could not be avoided would be temporarily impacted from

replacement of these same structures, culvert replacement, line component replacement at one structure, and placement of one pulling and tensioning site located partially within a wetland. Impacts would be minimized by using the existing road system and complying with conditions in the US Army Corps of Engineers Section 404 Authorization. Additional measures used to minimize potential impacts to wetlands would include, working in the dry season, if possible; flagging wetland boundaries; using temporary equipment mats in wetlands in the wet season; implementing erosion control measures; using barrier wraps on wood poles placed within 50 feet of wetlands and streams to help prevent potential leaching of pentachlorophenol; depositing and stabilizing excess soils in upland areas outside of wetlands; and restoring and replanting disturbed areas.

DETERMINATION

Based on the information in the EA, as summarized here, BPA determines that the Proposed Action is not a major federal action significantly affecting the quality of the human environment within the meaning of NEPA (42 USC 4321 *et seq.*). Therefore, an EIS will not be prepared and BPA is issuing this FONSI for the Proposed Action.

Issued in Portland, Oregon.

/s/ SCOTT G. ARMENTROUT

SCOTT G. ARMENTROUT
Executive Vice President
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March 12, 2020

Date